

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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PAN AMERICAN AIRWAYS CORP. )

Plaintiff )

v. )

ROBERT E. BARNES )

Defendant )

U.S. DISTRICT COURT  
DISTRICT OF MASS.

Civil Action No. 04-10515-JLT

**ASSENTED TO MOTION TO EXTEND  
DEADLINE FOR COMPLETION OF DISCOVERY  
AND CONTINUANCE OF STATUS CONFERENCE**

Pursuant to the Order issued by this Court on November 2, 2004 the deadline for completion of discovery was set at March 31, 2005 and a status conference was scheduled for April 11, 2005. Although the parties have made significant progress towards the completion of discovery, they have agreed that additional time is required in order to permit the completion of that process. Accordingly, plaintiff Pan American Airways Corp., by its attorney, respectfully moves this Court to extend the deadline for both parties to complete discovery. In support of this motion, counsel for the plaintiff represents that the parties have been actively engaged in written and deposition discovery since the issuance of the Order referenced above. At present, the parties believe that an additional period of thirty (30) days, until April 30, 2005, for the completion of discovery will be sufficient. The parties also request that the status conference be rescheduled to a date shortly thereafter in order to afford the parties the best opportunity to advise the Court with respect to the actual status of the case.

No memorandum accompanies this Motion, as counsel for the defendant has assented hereto.

Dated: March 29, 2005

Respectfully submitted,

**PAN AMERICAN AIRWAYS CORP.**

By:

  
John R. Nadolny (BBO#544393)

Attorney for Plaintiff  
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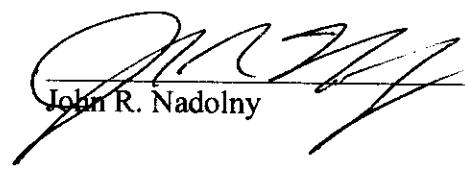
#### **CERTIFICATE OF SERVICE**

I, John R. Nadolny, hereby certify that a copy of the foregoing Assented to Motion To Extend Deadline for Completion of Discovery and Continuance of Status Conference was served upon the defendant in this matter by mailing same, first class postage pre-paid, this 29<sup>th</sup> day of March, 2005 to:

Counsel for Defendant:

Peter Piel, Esq.  
800 Turnpike Street  
Suite 300  
North Andover, MA 01845

March 29, 2005

  
John R. Nadolny